

LAW OFFICES OF KENNETH L. BAUM LLC

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Attorneys for Midstate Mall, LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
TOWN SPORTS INTERNATIONAL LLC,	:	Case No. 20-12168 (CSS)
et al.,	:	
	:	Joint Administration Requested
Debtor.	:	

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Midstate Mall, LLC (“Landlord”) hereby appears by and through its undersigned counsel, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Landlord, by and through its counsel, hereby requests, pursuant to Bankruptcy Rules 2002, 9007, 9010, and the applicable Local Rules, that all notices given or required to be given on it, and all papers served or required to be served on it in this case, be given to and served upon the following:

Kenneth L. Baum, Esq.
Law Offices of Kenneth L. Baum LLC
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Hackensack, New Jersey 07601
Telephone: (201) 853-3030
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, e-mail, delivery, telephone, telex or otherwise filed or made with regard to the referenced case and proceeding herein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive any rights to: (1) challenge the jurisdiction of the Court to adjudicate any matter, including, without limitation, any non-core matter; (2) have final orders in non-core matters entered only after *de novo* review by the District Court; (3) trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to this case; (4) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, setoffs or recoupments to which Landlord is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

LAW OFFICES OF KENNETH L. BAUM
LLC
Attorneys for Midstate Mall, LLC

By: /s / Kenneth L. Baum
Kenneth L. Baum

Dated: September 30, 2020